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Missouri Department of Elementary and Secondary Education

— Making a positive difference through education and service —

April 14, 2008

Ms. Ruth E. Ryder, Director Monitoring and State Improvement Planning Division (MSIP) Office of Special Education Programs (OSEP) 550 12th Street SW Washington, DC 20202

Dear Ms. Ryder:

The *Missouri Part B FFY 2006 SPP/APR Status Table* received from the Office of Special Education Programs (OSEP) on April 7, 2008, has been reviewed. Following is our response to items identified under the heading "Status of APR Data/SPP Revision Issues" as well as our response to the two data tables included (1) 618 Data-Indicator 20 and (2) SPP/APR Data-Indicator 20.

Indicator 11:

OSEP indicated that Missouri did not provide all of the actual numbers required by the measurement for this indicator. It was not clear whether the "Number within 60 days or with acceptable reason" (1,873) includes only children who were found eligible or both children found eligible and children found ineligible.

Missouri Response:

Missouri has revised the chart on page 42 of the APR to correct the data calculation.

Indicator 12:

OSEP indicated that the state reported "acceptable reasons" for delays, but some of the state's reported reasons are not acceptable. OSEP's recalculation of the state's data is 80.25%. The state did not provide all of the actual numbers required by the measurement for this indicator.

Missouri Response:

Missouri has revised pages 44-46 of the APR to correct the data calculation and provide explanation and clarification regarding the changes.

Indicators 16, 17, 18, 19:

OSEP indicated that the state did not attach Table 7.

Missouri Response:

Missouri is submitting a complete, revised copy of the February 2008 APR with the revisions to Indicators 11 and 12 incorporated as indicated above and with Table 7 as an attachment.

618 Data Table-Indicator 20:

The 618 Data-Indicator 20 Table provided by OSEP indicated that Missouri received zero points for "Timely" on Table 1, 3, and 6. It also indicated that zero points were received on Table 1 and 3 for "passed edit checks" and on Table 3 for "Responded to Data Note Requests."

Missouri Response:

Missouri has worked with Carol Bruce at DAC to correct the scores on this table.

Timely: Tables 1 & 3

Missouri was an EDEN only submitter for these tables for 2006-07. Due to EDEN issues, the due date for these tables was extended to February 15. Missouri submitted the EDEN files by the extended due date.

Timely: Table 6

According to Carol Bruce at DAC, Missouri did submit the Assessment table on time. She emailed Mary Corey, Director, Data Coordination the following on April 9, 2008: "As for the timeliness of your Part B Assessment data submission, our records show that both the 2005-06 and 2006-07 data were submitted on time and it looks like the verification information that I provided to MSIP reflected that. It may be that MSIP made a typo here for that one."

Responded to Data Notes: Table 3

On April 9, 2008, Mary Corey, Director, Data Coordination forwarded Carol Bruce documentation that we had responded to the data note request. On that same day, Carol emailed the following: "Thanks for providing this documentation of your 2006 Part B LRE Data Note. I will forward this to our data processing staff and have them correct the tracking log. I will also revise the verification information that I provided to MSIP accordingly."

Passed Edit Check: Tables 1 & 3

Missouri was an EDEN-only submitter for these tables, and, as one of the first EDEN-only states, did not have access to the edit checks prior to submission of the data. At that time, EDEN did not have summary reports available prior to submission, and, while Special Education staff worked closely with the IT staff responsible for submitting the EDEN files, some minor discrepancies were not caught. The discrepancies amounted to failing to populate the non-LEP fields in the EDEN submission as well as a difference of four students in overall totals for ages 6-21. Missouri has a long history of submitting red-cell-free DANS reports, and we feel that we are losing these points because we were one of approximately 15 states who had to use the EDEN submission without the luxury of error checking functionality. The data elements required by the EDEN submission are much more extensive and detailed than those required by the DANS submission, and the errors were corrected

immediately upon notification from Westat, which again, was the first opportunity we had to review edit checks for the data. We feel that these circumstances should be taken into account, including the efforts Missouri made to submit the data through EDEN when many other states had not yet been cleared for EDEN-only submissions.

SPP/APR Data-Indicator 20:

The SPP/APR Data-Indicator 20 Table provided by OSEP indicated Missouri received zero points for "valid and reliable" and "correct calculation" on Indicator 12.

Missouri Response:

Both the Valid and Reliable and Correct Calculation points were withheld. While the data could not be presented in the detail required by the measurement table, the final result is, in fact, valid and reliable. The indicator reads: Percent of children referred by Part C prior to age 3 who are found eligible for Part B and who have an IEP developed and implemented by their third birthday. The resulting percent is exactly that – the percent of eligible children who had an IEP developed and in place by their third birthday. Therefore, the lack of detail required by the measurement table does not impact the validity and reliability of the data. The state believes at least one, if not both, of the points should be awarded.

Thank you for the opportunity to review and respond to OSEP's analysis of our February 2008 APR and data submission. We trust we have provided all the necessary changes and clarifications.

Sincerely,

Heidi Atkins Lieberman, Assistant Commissioner Division of Special Education

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c: Mr. Larry Ringer

Ms. Marion Crayton

Ms. Pam Williams

Ms. Mary Corey

Ms. Margaret Strecker

Ms. Julia LePage